

EXHIBIT C

Deposition Transcript of Eugene Chrinian

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UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

CASE NO. 13-CV-2443 (DMC) (MF)

CIVIL ACTION

MOHAMMAD MANSOUR and :
MARK MOSES,

:

Plaintiffs, :
vs.

:

FACTORY DIRECT OF SECAUCUS, :
LLC d/b/a ASHLEY FURNITURE

HOMESTORE, :
Defendant. :

Deposition of EUGENE CHRINIAN
taken in the above-entitled matter before
Suzanne J. Stotz, a Certified Court Reporter
(License No. 30XI00184500) and Notary Public of
the State of New Jersey, taken at the offices
of ARCHER & GREINER, P.C., Court Plaza South,
West Wing, 21 Main Street, Suite 353,
Hackensack, New Jersey 07601, on Friday,
August 1, 2014, commencing at 9:14 a.m.

1 A. It was just her professional
 2 opinion that I should be aware, and I would
 3 expect that she would take the necessary steps.

4 Q. At that time did the HR employee
 5 inform you to whom Ms. Hoang initially made her
 6 complaint?

7 A. I don't recall.

8 Q. Are you aware that the complaint
 9 was initially made to Mr. Mansour?

10 A. No.

11 Q. Are you aware of an investigation
 12 that took place into Ms. Hoang's complaint?

13 A. Subsequent, as I said, I
 14 directed -- I didn't direct. The HR -- I had
 15 Ms. Hoang -- she raised her concern. I
 16 directed her to the HR manager so the HR
 17 manager could take the appropriate steps,
 18 whatever those steps would be.

19 Q. Did you at any time direct the HR
 20 manage to keep the accusation quiet?

21 A. No.

22 Q. Are you aware of anyone contacting
 23 Mr. Mansour with respect to Ms. Hoang's
 24 allegation?

25 A. No.

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1 Q. Were you consulted with respect to
 2 the decision to terminate Mr. Mansour?

3 A. No.

4 Q. Were you made aware of the
 5 allegation that he was stealing?

6 A. Clarify please.

7 Q. I withdraw the question.

8 MR. VALLAS: I'd like to ask the
 9 court reporter to mark this document
 10 Chrinian 3.

11 (Whereupon, Exhibit No. Chrinian 3,
 12 Answers to Interrogatories, was marked for
 13 identification.)

14 BY MR. VALLAS:

15 Q. Mr. Chrinian, I do have questions
 16 about specific pages of this document; but
 17 before I ask you to review it, I just want to
 18 ask whether you recognize it?

19 A. No.

20 Q. Are you aware that Factory Direct
 21 was served with Interrogatories in this matter?

22 A. No.

23 Q. Do you know what Interrogatories
 24 are?

25 A. No.

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1 Q. Did you direct any Factory Direct
 2 employee to contact Mr. Mansour with respect to
 3 Ms. Hoang's allegation?

4 A. I was not involved in the
 5 investigation; or it was the HR manager, as I
 6 said earlier, who is responsible to follow up
 7 on any employee inquiry of any kind.

8 Q. So the answer then is no?

9 A. No.

10 Q. Why did Mr. Mansour's employment
 11 with Factory Direct cease?

12 A. It ceased -- he was terminated for
stealing.

13 Q. Mr. Mansour was terminated?

14 A. For stealing.

15 Q. Do you know who -- strike that.
 16 Who made the decision to terminate
 17 Mr. Mansour?

18 A. His supervisor.

19 Q. Who was his supervisor at the time?

20 A. It would have been Jerry Cook in
 21 HR.

22 Q. And the HR director at the time was
 23 Hazel Bautista, correct?

24 A. Yes.

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1 Q. I'd like to direct your attention
 2 to page 7 of this document, and specifically
 3 the second paragraph from the top beginning
 4 with Mr. Cook. The paragraph reads, "Mr. Cook
 5 planned to discharge Mansour January 17, 2012,
 6 meeting. But after being confronted with
 7 evidence of his theft and contradicted by Maj
 8 and Ms. Arias, Mansour became frustrated and
 9 stated that he was resigning from employment.
 10 Mr. Cook accepted Mansour's resignation and
 11 Mansour walked out."

12 Were you involved in the
 13 preparation of that answer at all?

14 A. No.

15 Q. Did Mr. Cook inform you that
Mr. Mansour had resigned?

16 A. No. Subsequently, I was notified
that he was caught stealing. He was caught on
tape and that they sat down with him with the
proof and he denied it. So they fired him.

17 Q. Mr. Cook told you that they had
fired him?

18 A. (Witness nodding.)

19 Q. When you say --

20 A. That's what you do when you catch

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[13] (Pages 46 to 49)